

**EXHIBIT 2**  
**REQUESTS TO PRODUCE IN ISSUE AND DEFENDANTS' OBJECTIONS**

**REQUEST NO. 12**

All Documents concerning any diligence/underwriting policies, procedures, or similar written guidelines followed by YieldStreet (including but not limited to its Credit Committee(s)) from January 1, 2017, to the present.

**RESPONSE TO REQUEST NO. 12**

The Entity Defendants restate each of their General Objections as if fully set forth herein. The Entity Defendants object to this Request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information beyond the Offerings at issue in this matter. The Entity Defendants will construe this Request as asking for material related to the Offerings only. The Entity Defendants further object to this Request on the grounds that it is overbroad as to time and subject matter. The Entity Defendants will construe the relevant time period for this Request to date from January 1, 2018 to October 1, 2019.

Subject to and without waiving the foregoing objections, the Entity Defendants will conduct a reasonable search and will produce responsive non-privileged documents, to the extent such documents have not been produced already.

**RESPONSE TO REQUEST NO. 28**

The Entity Defendants restate each of their General Objections as if fully set forth herein. The Entity Defendants further object to this Request to the extent it seeks material protected by the attorney-client privilege, work product doctrine, or other applicable privilege or protection. The Entity Defendants further object to this Request as overbroad to the extent it seeks information about Offerings not at issue in this matter. The Entity Defendants further object to this Request as overbroad, unduly burdensome, and lacking in particularity, and seeking documents that are neither relevant to the claims or defenses of any party to the pending action nor proportional to the needs of this case, insomuch as Plaintiffs have only alleged a borrower default prior to April 5, 2018 in connection with one YieldStreet offering (i.e., the Rideshare / Fleet Expansion offering).

Subject to and without waiving the foregoing objections, the Entity Defendants respond that they have conducted a reasonable search and produced responsive non-privileged documents concerning the Offerings, and will conduct a reasonable search and produce additional Responsive non-privileged documents concerning the Rideshare / Fleet Expansion offering.

#### **REQUEST NO. 34**

A complete accounting for any offering(s) responsive to the previous request, including but not limited to all Documents demonstrating funds received from investors, loaned to borrowers, any repayment(s) of those funds, expenses charged to and/or paid by You (including legal fees), costs of collection efforts, and all payments to investors in those Offerings, as well as any internal accounting or tax reporting items (e.g., impairments, write downs, bad debt expense, or declarations of default).

#### **RESPONSE TO REQUEST NO. 34**

The Entity Defendants restate each of their General Objections as if fully set forth herein. The Entity Defendants further object to this Request to the extent it seeks material protected by the attorney-client privilege, work product doctrine, or other applicable privilege or protection. The Entity Defendants also object to this Request to the extent it requires the creation of documents or data compilations that do not exist or are not ordinarily kept in the normal course of business. The Entity Defendants object to the term “a complete accounting” as vague. The Entity Defendants further object to this Request as overbroad to the extent it seeks information about Offerings not at issue in this matter. The Entity Defendants further object to this Request as vague, overbroad, unduly burdensome, and lacking in particularity, and seeking documents that are neither relevant to the claims or defenses of any party to the pending action nor proportional to the needs of this case, in particular because it fails to identify the offerings at issue.

Subject to and without waiving the foregoing objections, the Entity Defendants respond that they have already produced or agreed to produce responsive non-privileged documents relating to the Offerings and the Rideshare / Fleet Expansion offering, including audited financial statements and an exemplar Form K-1 for the Offerings and the Rideshare / Fleet Expansion offering.

#### **REQUEST NO. 35**

All Documents concerning policies, procedures or written guidelines You use now or used in the past to determine when a borrower’s principal payment default per the terms of a loan contract and/or a failure of guarantees and/or securitization rights triggers a duty to notify those investors who participated in the associated YieldStreet offering of the events and/or potential or actual effect on their investment.

#### **RESPONSE TO REQUEST NO. 35**

The Entity Defendants restate each of their General Objections as if fully set forth herein. The Entity Defendants further object to this Request to the extent it seeks material protected by the attorney-client privilege, work product doctrine, or other applicable privilege or protection. The Entity Defendants object to this Request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information beyond the Offerings at issue in this matter. The Entity Defendants will construe this Request as asking for material related to the Offerings only.

Subject to and without waiving the foregoing objections, the Entity Defendants respond that there are no responsive non-privileged documents during the relevant time period.